

LAURA CURRAN
County Executive



JARED A. KASSCHAU
County Attorney

**COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY**

July 1, 2019

Via ECF

Hon. James Orenstein
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Cohen v. Kreisberg, et al.
CV-16-4405 (KAM) (JO)

Dear Judge Orenstein:

This office represents Nassau County Police Sergeant DiScala, and Nassau County Police Officers Calamia, Maiorano, Doerrie and Buckley, the Defendants in the above-referenced action. In accordance with the Court's directives, issued in its May 20, 2019 and July 1, 2019 Electronic Order, this letter is submitted to report on the status of settlement discussions. Plaintiff has filed a separate letter on this issue, docketed as DE 47.

As previously reported to the Court, Plaintiff made a settlement demand. The amount requested by Plaintiff is considered excessive. However, at this time the undersigned does not have authority to propose a counter-offer. Thus, there has not been any meaningful negotiations.

Mr. Cohen was informed of this. Rather than extend the time within which to report to the Court on the progress of settlement talks, Mr. Cohen has chosen to continue with the litigation, as he has the right to do.

What I propose, should same be acceptable to Plaintiff and the Court, is to proceed with discovery in this case while following up on the possibility of a counter-offer to Plaintiff. If or when the undersigned is able to convey a counter-offer to Plaintiff, she shall do so. Essentially, we would proceed with discovery and keep the prospect of settlement open as well.

Thank you for your time and attention in this matter.

Respectfully submitted,

Liora M. Ben-Sorek
Liora M. Ben-Sorek
Deputy County Attorney

cc: Adam Daniel Cohen, Plaintiff *Pro Se*
(Via E-Mail and First-Class Mail)